

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION**

**ADAM SINDELL,** )  
**Plaintiff,** )  
**v.** ) CIVIL ACTION FILE NO.:  
**LATONYA COACH, *et al.*,** )  
**Defendants.** ) 5:22-cv-00365-CAR

**MOTION FOR SUMMARY JUDGMENT**

COME NOW DEFENDANTS LaTonya Coach and Jacob Cleckner<sup>1</sup> and, pursuant to Rule 56 of the Federal Rules of Civil Procedure, file this Motion for Summary Judgment as to all claims set forth in Plaintiff's Complaint. In support of this motion, Defendants rely upon all pleadings and discovery filed in this matter, as well as the following exhibits:

1. Pod video from June 30, 2020;
2. Hall video from June 30, 2020;
3. Kyle Boerger IA interview video;
4. Records from medical evaluation following the incident;
5. Photos of Plaintiff following the incident;
6. Deposition of Adam Sindell;

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<sup>1</sup> Plaintiff agreed to dismiss Defendant Boerger from the case. A consent motion and proposed order to that effect were filed on August 9, 2023. Doc. 12.

7. Deposition of LaTonya Coach;
8. Deposition of Jacob Cleckner.

WHEREFORE, for the reasons set forth in Defendants' accompanying Brief, Defendants request the Court to grant complete summary judgment in their favor. Should the Court dismiss fewer than all claims, Defendants respectfully request the Court to certify any dismissal as a final order under Fed. R. Civ. P. 54.

WILLIAMS & WAYMIRE, LLC

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served the within and foregoing MOTION FOR SUMMARY JUDGMENT, BRIEF IN SUPPORT, STATEMENT OF MATERIAL FACTS and supporting EXHIBITS on all parties via the Court's CM/ECF system.

By agreement of counsel the video recordings are provided to Plaintiff's counsel using an internet file sharing platform.

This 14 day of August, 2023.

/s/ Jason Waymire  
JASON WAYMIRE